

EXHIBIT 2

DECLARATION OF DAVID HONIG

I, David Honig, state as follows:

I am the communications counsel for the Spanish American League Against Discrimination ("SALAD"). In this capacity, I performed legal services in this matter on behalf of SALAD. I am familiar with the time and charges of my co-counsel in this matter, Eduardo Peña, Esq. and Ronda Robinson, Esq.

The following chart summarizes the hours spent on this case. Hours have been rounded downward to the nearest half hour. Tasks requiring less than 1/2 hour of time and time spent preparing this fee statement is not reflected below.

Where tasks were performed on behalf of SALAD and also any of the California State Conference of Branches of the NAACP, the Alaska/Oregon/Washington State Conference of Branches of the NAACP and the League of United Latin American Citizens, each of which was pursuing related litigation, the times shown below represent SALAD's pro rata share of the cumulative time spent on the matter.

David Honig

<u>Work Performed</u>	<u>Hours</u>
Pre-litigation preparation (does not include work done in WTGI-TV, Wilmington, DE case; does include work assembling files for Miami proceedings, including updating case and substantive research for possible trial)	26.0
Continued research on "Set Free" and other basic qualifications issues not designated for trial	15.0
Client briefings at commencement of litigation	1.5
SALAD's Petition to Deny WTBK-TV renewal application	9.0
Reviewed Opposition to Petition to Deny and Glendale's draft Reply; filed Statement for the Record	1.5
Reviewed WTBK-TV quarterly issues/programs lists and researched public issues and events during time period covered by lists	22.0
Master potential witness and contact list	4.0

Trained intern and co-counsel and paralegal to assist with discovery	12.0
Prepared two witness questionnaires (oral and written)	11.5
Information packages to be reviewed by each potential witness on subject matters of her possible testimony	17.0
Memorandum to Potential Witnesses	3.5
Request for Production of Documents	7.5
Worked out deposition schedule w/opposing counsel and SALAD witnesses	2.5
Memorandum of Agreement regarding discovery procedures	1.5
<u>In Camera</u> filing regarding depositions	0.5
Opposition to Notices of Deposition, Anticipatory Motion to Quash <u>Subpoena Duces Tecum</u> , and Motion for Protective Order	6.5
Comments on Response to Opposition to Notices of Deposition, and Motion for Leave to File same	5.5
Motion to Adjust Procedural Dates	2.0
Memo to client regarding 17 community issues addressed by WTBF-TV	2.5
Prepared written testimony for twelve SALAD witnesses; interviewed witnesses and supervised deposition preparation	65.0
Preparation of trial exhibits and direct case package with 34 exhibits	15.0
Prepared questions to be asked of Trinity witnesses at trial	27.0
Trained and supervised junior counsel who assisted with trial <u>pro bono</u> ; reviewed trial daily with co-counsel	35.0
Motion on cameras in the courtroom	14.0
Findings of Fact and Conclusions of Law	54.0
Erratum to Findings and Conclusions	3.5
Reviewed other parties' findings and conclusions	9.0
Reply Findings and Conclusions	37.0
Reviewed other parties' reply findings and conclusions	6.5
Request for Official Notice (minority ownership)	4.0

Letter to ALJ regarding Trinity's Reply Findings	5.5
Three concept memoranda for 1995 attempt at settlement; failed settlement negotiations	12.5
Discussions w/client and colleagues regarding <u>I.D.</u> (<u>pro rata</u>)	2.5
Statement to Review Board in Lieu of Exceptions	0.5
Reviewed Trinity's Exceptions	3.0
Reply to Exceptions	36.0
Reviewed other parties' reply exceptions	2.5
Request for Oral Argument	0.5
Opposition to Motion to Vacate the Record on Improviently Designated Issues	13.0
Opposition to Petition of Colby May for Leave to Intervene, File Comments and Participate in Oral Argument	10.5
Reviewed other parties' pleadings in Colby May matter and discussed w/client	2.0
Memo to all counsel with analysis of settlements of comparative hearings, in anticipation of possible negotiations (<u>pro rata</u>)	5.5
Negotiation of settlement and preparation of joint motion for approval and supporting documents (not including fee statement) (<u>pro rata</u>)	14.5
<u>TOTAL HOURS, D. HONIG</u>	530.00

Eduardo Peña

<u>Work Performed</u>	<u>Hours</u>
Pre-litigation preparation	5.0
Client briefings at commencement of litigation	1.5
Review of SALAD's Petition to Deny WTBF-TV Renewal	2.0
Consultation with trial counsel during discovery and trial of WTBF-TV hearing	6.0
Reviewed Direct Case package	2.0
Reviewed Findings of Fact and Conclusions of Law	2.0
Reviewed Reply Findings and Conclusions	1.5

Discussions w/client and colleagues regarding <u>I.D.</u> (<u>pro rata</u>)	1.0
Reviewed Reply to Exceptions	1.5
Reviewed Opposition to Motion to Vacate the Record on Improviently Designated Issues	1.0
Reviewed Opposition to Petition of Colby May for Leave to Intervene, File Comments and Participate in Oral Argument	1.0
Participated in Negotiation of settlement; reviewed supporting documents (not including fee statement) (<u>pro rata</u>)	9.0
<u>TOTAL HOURS, E. PENA</u>	33.5

Ronda Robinson

<u>Work Performed</u>	<u>Hours</u>
Notice of Appearance	0.5
Reviewed case record in preparation for discovery	12.0
Prepared witnesses for depositions	22.0
Defended depositions and debriefed witnesses	19.0
Reported on depositions to senior counsel	4.0
<u>TOTAL HOURS, R. ROBINSON</u>	57.5

The attributable hourly rate ordinarily compensable to me and to Mr. Peña for civil rights litigation in the federal courts is \$245.00, and the attributable hourly rate ordinarily compensable to Ms. Robinson for civil rights litigation in the federal courts is \$175.00. Thus, the total amount of reimbursable fees is \$148,120.00.

Out of pocket expenses incurred on this matter were:

Shipping and Postage	\$ 465
Paralegals' Time (\$50/hour)	800
Intern's and Clerk's Time (\$12/hour)	3,760
Duplication (approximate)	1,350
Telephone and Fax (approximate)	200
Travel (<u>pro rata</u>) (D. Honig)	675
<u>TOTAL OUT OF POCKET EXPENSES</u>	\$7,250

Thus, the total time and charges attributable to this matter is \$155,370.00.

I declare under penalty of perjury under the laws of the United States of America that the foregoing Declaration is true and correct.

Executed 4/2/98.

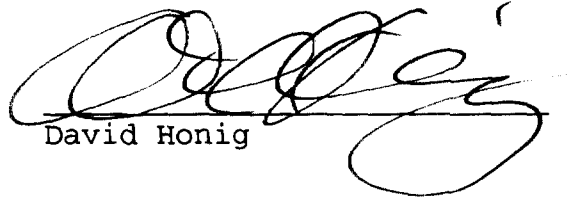

David Honig

EXHIBIT 3

Declaration of No Consideration

I, Terrence M. Hickey, am the Assistant Secretary of Trinity Christian Center of Santa Ana, Inc. d/b/a Trinity Broadcasting Network ("Trinity"), and I am the Assistant Secretary of Trinity Broadcasting of Florida, Inc. ("TBF").

I hereby certify that neither I nor anyone else representing Trinity or TBF has delivered or promised any money or other thing of value to the Spanish American League Against Discrimination ("SALAD") in connection with the foregoing Agreement, with the exception of the proposed reimbursement of a portion of SALAD's legitimate and prudent legal fees and expenses as set out in the foregoing Agreement.

There are no oral agreements or other written agreements between Trinity and SALAD or between TBF and SALAD.

Furthermore, neither SALAD, nor any person or organization related to SALAD, is or will be involved in carrying out, for a fee, any programming, ascertainment, employment, or other non-financial initiative referred to in the Agreement.

I declare under penalty of perjury under the laws of the United States of America that the foregoing statement is true and correct.

Executed April 3, 1998.


Terrence M. Hickey

EXHIBIT 4

Declaration of No Consideration

I, Jane P. Duff, am the President of National Minority T.V., Inc. ("NMTV").

I hereby certify that neither I nor anyone else representing NMTV has delivered or promised any money or other thing of value to the Spanish American League Against Discrimination ("SALAD") in connection with the foregoing Agreement.

There are no oral agreements or other written agreements between NMTV and SALAD.

Furthermore, neither SALAD, nor any person or organization related to SALAD, is or will be involved in carrying out, for a fee, any programming, ascertainment, employment, or other non-financial initiative referred to in the Agreement.

I declare under penalty of perjury under the laws of the United States of America that the foregoing statement is true and correct.

Executed 4-6-98.

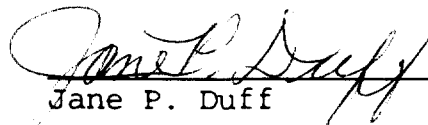

Jane P. Duff

EXHIBIT 5

Declaration of No Consideration

I, Osvaldo Soto, am the President of the Spanish American League Against Discrimination ("SALAD").

I hereby certify that neither I nor anyone else representing SALAD has received or been promised any money or other thing of value in connection with the foregoing Agreement with the exception of the proposed reimbursement of a portion of SALAD's legitimate and prudent legal fees and expenses as set out in the foregoing Agreement.

There are no oral agreements or other written agreements between SALAD and Trinity Christian Center of Santa Ana, Inc. d/b/a/ Trinity Broadcasting Network, between SALAD and Trinity Broadcasting of Florida, Inc., or between SALAD and National Minority T.V., Inc. ("NMTV").

Furthermore, neither SALAD, nor any person or organization related to SALAD, is or will be involved in carrying out, for a fee, any programming, ascertainment, employment, or other non-financial initiative referred to in the Agreement.

I declare under penalty of perjury under the laws of the United States of America that the foregoing statement is true and correct.

Executed 4-7-98.


Osvaldo Soto

CERTIFICATE OF SERVICE

I, Howard A. Topel of the law firm of Fleischman and Walsh, L.L.P., hereby certify that on this 13th day of April, 1998, copies of the foregoing Joint Request for Approval of Settlement Agreement were hand delivered to the following:

Hon. William E. Kennard
Chairman
Federal Communications Commission
1919 M Street, N.W. -- Room 814
Washington, D.C. 20554

Hon. Susan Ness
Commissioner
Federal Communications Commission
1919 M Street, N.W. -- Room 832
Washington, D.C. 20554

Hon. Harold Furchtgott-Roth
Commissioner
Federal Communications Commission
1919 M Street, N.W. -- Room 802
Washington, D.C. 20554

Hon. Michael K. Powell
Commissioner
Federal Communications Commission
1919 M Street, N.W. -- Room 844
Washington, D.C. 20554

Hon. Gloria Tristani
Commissioner
Federal Communications Commission
1919 M Street, N.W. -- Room 826
Washington, D.C. 20554

Christopher J. Wright, Esq.
General Counsel
Federal Communications Commission
1919 M Street, N.W. -- Room 614
Washington, D.C. 20554

P. Michelle Ellison, Esq.
Deputy General Counsel
Federal Communications Commission
1919 M Street, N.W. -- Room 614
Washington, D.C. 20554

Daniel M. Armstrong, Esq.
Associate General Counsel -- Litigation
Federal Communications Commission
1919 M Street, N.W. -- Room 602
Washington, D.C. 20554

John I. Riffer, Esq.
Assistant General Counsel -- Administrative Law
Federal Communications Commission
1919 M Street, N.W. -- Room 610
Washington, D.C. 20554

Roy J. Stewart, Chief
Mass Media Bureau
Federal Communications Commission
1919 M Street, N.W. -- Room 314
Washington, D.C. 20554

Robert H. Ratcliff, Esq.
Mass Media Bureau
Federal Communications Commission
1919 M Street, N.W. -- Room 314
Washington, D.C. 20554

Norman Goldstein, Esq.
Chief, Complaints/Political Programming Branch
Federal Communications Commission
1919 M Street, N.W. -- Room 8210
Washington, D.C. 20554

James Shook, Esq.
Mass Media Bureau
Federal Communications Commission
1919 M Street, N.W. -- Room 7212
Washington, D.C. 20554

Gene A. Bechtel, Esq.
Bechtel & Cole, Chartered
1901 L Street, N.W. -- Suite 250
Washington, D.C. 20036



Howard A. Topel